

GOMMUS®	ORGANISATION, MANAGEMENT AND CONTROL MODEL <i>(PURSUANT TO LEGISLATIVE DECREE 231/01)</i>	Rev.:	0
		Dated:	

GOMMUS SOC. COOP. P. A.

ORGANISATION, MANAGEMENT AND CONTROL MODEL

PURSUANT TO LEGISLATIVE DECREE NO. 231 OF 8 JUNE 2001

CODE OF ETHICS

Document approved on:

This document is the property of the Company, which reserves all rights to its contents.
Any unauthorised use is prohibited and will be prosecuted in accordance with the law.

	ORGANISATION, MANAGEMENT AND CONTROL MODEL <i>(PURSUANT TO LEGISLATIVE DECREE 231/01)</i>	Rev.:	0
		Dated:	

TABLE OF CONTENTS

1. INTRODUCTION	3
2. RECIPIENTS OF THE CODE OF ETHICS.....	3
3. MEMBERS' REGULATIONS AND INTERNAL COMPANY REGULATIONS: CROSS-REFERENCE	4
4. CONFLICT OF INTEREST	4
5. OUR VALUES	4
6. FAIRNESS AND TRANSPARENCY IN BUSINESS.....	5
7. SAFEGUARDING LEGALITY	5
8. INTERNAL CONTROLS	5
9. RELATIONS WITH STAKEHOLDERS	6
<i>Relations with Customers.....</i>	<i>6</i>
<i>Relations with Public Contracting Authorities</i>	<i>6</i>
<i>Relations with Suppliers.....</i>	<i>6</i>
<i>Relations with Personnel and Protection of the Individual</i>	<i>7</i>
<i>Relations with Institutions and the Public Administration.....</i>	<i>8</i>
<i>Relations with Political Parties, Trade Unions and Associations</i>	<i>9</i>
10. RELATIONS WITH MEMBERS AND PROTECTION OF COMPANY ASSETS	9
11. ACCOUNTING RECORDS AND CORPORATE TRANSACTIONS.....	10
12. HANDLING OF CONFIDENTIAL INFORMATION.....	10
13. HEALTH AND SAFETY IN THE WORKPLACE	10
14. ENVIRONMENT.....	12
15. INTERNAL AND EXTERNAL COMMUNICATIONS	12
16. PRIVACY.....	12
17. IT RESOURCES.....	13
18. GIFTS AND HOSPITALITY	13
19. CONTRIBUTIONS TO THIRD PARTIES.....	13
20. SUBSIDIARIES AND ASSOCIATED COMPANIES	13
21. ADOPTION OF THE CODE OF ETHICS.....	13
22. REPORTING VIOLATIONS AND WHISTLEBLOWING	14
<i>Duty to Report</i>	<i>14</i>
23. DISCIPLINARY SYSTEM.....	14
24. PUBLICATION	14

	ORGANISATION, MANAGEMENT AND CONTROL MODEL <i>(PURSUANT TO LEGISLATIVE DECREE 231/01)</i>	Rev.:	0
		Dated:	

1. INTRODUCTION

This Code of Ethics is the instrument adopted by GOMMUS SOC. COOP. P. A. (hereinafter also “GOMMUS”, the “Cooperative” or the “Company”) to define the set of ethical values that the Company recognises, accepts and shares, as well as the responsibilities assumed by the Company and its collaborators in internal and external relations.

By adopting the Code of Ethics, the Company identifies the principles and rules of conduct to which it assigns positive ethical value, with a view to directing its business activities along a path of legality, transparency, competence, integrity and sound management practices.

The principles set out in the Code are contractual in nature and are binding on directors, employees, consultants and anyone who establishes collaboration or partnership relationships with GOMMUS, in any capacity, directly or indirectly, on a permanent or temporary basis, in Italy or abroad (collectively, the “Recipients” and individually, a “Recipient”).

Any breach of the provisions of the Code of Ethics undermines the relationship of trust established with the Company and may result in disciplinary action and claims for damages, without prejudice, in the case of employees, to compliance with the procedures under Law No. 300 of 20 May 1970 (the so-called Workers’ Statute), collective bargaining agreements and any company regulations adopted by GOMMUS.

Compliance with the provisions of the Code shall, in particular, be deemed an essential part of employees’ contractual obligations pursuant to and for the purposes of Article 2104 et seq. of the Italian Civil Code.

This Code is approved by the Governing Body.

Any amendment and/or supplement thereto shall be approved by the Governing Body and promptly communicated to all Recipients.

The Company ensures:

- the widest possible dissemination and awareness of the Code of Ethics;
- continuous updating of the contents of the Code;
- interpretation and implementation of the provisions of the Code of Ethics;
- verification of any report of a breach of the Code of Ethics;
- assessment of the facts and application of appropriate sanctions in the event of a breach of the provisions of the Code of Ethics.

2. RECIPIENTS OF THE CODE OF ETHICS

GOMMUS promotes awareness of and compliance with the contents of the Code of Ethics and its updates among all Recipients, who are required to know its contents and, within the scope of their respective duties and functions, to contribute to the implementation and dissemination of the principles and rules set out therein.

The Recipients of the Code of Ethics are:

- the Company’s employees;
- the Company’s Governing Body;
- principals, consultants and business partners engaged by the Company to achieve its objectives;
- all parties maintaining contractual relationships with the Company, including occasional and/or temporary relationships;
- the Company’s shareholders/members.

	ORGANISATION, MANAGEMENT AND CONTROL MODEL <i>(PURSUANT TO LEGISLATIVE DECREE 231/01)</i>	Rev.:	0
		Dated:	

The provisions of the Code of Ethics apply without exception to all Recipients.

It is primarily the responsibility of the Governing Body to give practical effect to the values and principles contained in the Code of Ethics, strengthening trust and cohesion around its contents.

Recipients shall, within their respective areas of responsibility, comply with the following guiding principles, which they shall also observe in their dealings with one another:

- act in compliance with applicable laws and regulations;
- deal with customers, suppliers, the Public Administration, public supervisory authorities, public authorities or institutions, and any other third party encountered for professional reasons, with honesty, transparency, fairness and impartiality and without prejudice;
- compete fairly in the market;
- protect their own health and safety and that of third parties;
- avoid, or disclose in advance, any situations involving a conflict of interest.

3. MEMBERS' REGULATIONS AND INTERNAL COMPANY REGULATIONS: CROSS-REFERENCE

In addition to the provisions of this Code, reference is made, without exception, to the contents of the "Members' Regulations" and the "Internal Company Regulations" approved by the Company.

4. CONFLICT OF INTEREST

Recipients of the Code shall avoid any possible conflict of interest, with particular reference to interests that could affect their independence of judgement when determining the Company's best interests and the most appropriate manner of pursuing them.

Any situation giving rise to a potential conflict of interest shall be reported immediately to the Governing Body.

It is prohibited to pursue personal interests to the detriment of the Company's interests, or to make unauthorised personal use of Company assets or information acquired in the performance of one's duties.

By way of example, the following situations constitute conflicts of interest:

- economic and financial interests of an employee and/or their family members or acquaintances in the activities of suppliers, customers and competitors;
- use of one's position within the Company or information acquired in connection with one's work in a manner that may create a conflict between personal interests and the Company's interests;
- acceptance of money, favours or benefits from persons or third parties that have or intend to enter into business relations with the Company.

5. OUR VALUES

GOMMUS was founded in 1985 by a small group of workers who wanted to preserve the tradition of handcrafted rubber production. Developed according to the dynamics of the "Marche model", which stems from complex and diverse realities, GOMMUS has always combined an industrial structure with a craftsmanlike mindset, the capacity for large-scale production with attention to the needs of each individual customer, while maintaining competitiveness through efficient work organisation.

Our ongoing commitment to environmental issues has enabled us to obtain Bureau Veritas ISO 14001 environmental certification.

	ORGANISATION, MANAGEMENT AND CONTROL MODEL <i>(PURSUANT TO LEGISLATIVE DECREE 231/01)</i>	Rev.:	0
		Dated:	

Our Mission:

Respect

We have always been distinguished by our business ethics, based on respect for work and for the local area in which we operate.

Innovation

Innovation opens new paths to the world. We are constantly seeking innovative ideas, both in design and in the research and development of new materials and solutions.

Dynamism

We are able to respond to the needs of an ever-changing market thanks to extensive production experience in the use of countless materials.

Quality

Every day we develop the brand through innovative, original and top-quality products.

6. FAIRNESS AND TRANSPARENCY IN BUSINESS

The Company operates in accordance with the highest ethical standards of transparency and fairness in the management of its business activities; in carrying out its activities, it promotes a system of rules of conduct governing both its internal organisational structure and its relations with partners, in the awareness that the ability to establish efficient and effective operating rules is an essential means of strengthening stakeholder trust.

For the Company, ethical conduct is based on a firm commitment to the highest standards of responsibility, beginning with individual responsibility.

7. SAFEGUARDING LEGALITY

The Company condemns all criminal activities and criminal organisations (national or international) of any kind and, in conducting its business, opposes and prevents any form of participation in, external assistance to, support for (including indirect support) or provision of services for their members, associates and organisers.

8. INTERNAL CONTROLS

GOMMUS promotes at all levels a culture focused on control activities, in view of their contribution to improving workers' health and safety, environmental performance and business efficiency.

Internal controls mean the tools required to direct, manage and verify the activities of each individual corporate function, with the aim of ensuring compliance with the law and company procedures, protecting workers' health and safety, safeguarding Company assets, managing activities efficiently and providing accurate and complete accounting data.

Responsibility for implementing an effective internal control system is shared at every level of the organisational structure; therefore, all GOMMUS employees, within the scope of their duties, are responsible for defining and ensuring the proper functioning of activities and shall under no circumstances be induced to perform or omit acts in breach of their professional obligations or contrary to GOMMUS's interests.

The Supervisory Body pursuant to Legislative Decree 231/01, together with the Company's Governing Body and control bodies, shall have unrestricted access to data, documentation and information useful for the performance of their respective activities; GOMMUS managers and employees shall facilitate their work and shall under no circumstances prevent or hinder it.

	ORGANISATION, MANAGEMENT AND CONTROL MODEL <i>(PURSUANT TO LEGISLATIVE DECREE 231/01)</i>	Rev.:	0
		Dated:	

9. RELATIONS WITH STAKEHOLDERS

Relations with stakeholders are based on trust and on compliance with the laws and regulations in force in all countries in which GOMMUS operates.

Relations with Customers

GOMMUS considers its relationship with customers, meaning all public and private entities that purchase its products, to be important and therefore undertakes to apply the principles of transparency, trust and mutual satisfaction.

To this end, customer relations are managed as follows:

- avoiding discriminatory conduct towards customers;
- preparing contracts in a manner that makes them:
 - clear, complete and accurate, so that no element relevant to the customer's decisions is omitted;
 - compliant with applicable legislation, without resorting to unfair practices;
- undertaking to ensure the highest level of quality in the products offered, while duly considering customers' objective requirements;
- developing continuous dialogue with customers by receiving suggestions and any complaints collected through appropriate communication channels (telephone, e-mail and other internal/external channels);
- managing customer relationships transparently.

Relations with Public Contracting Authorities

When participating in public tenders, GOMMUS carefully assesses feasibility, avoiding contractual commitments that could foreseeably cause economic, asset-related or financial harm or force GOMMUS to make savings at the expense of production quality, personnel costs or occupational safety.

In its relations with public contracting authorities, GOMMUS undertakes to ensure the utmost fairness and clarity in commercial negotiations and in assuming contractual obligations.

Relations with Suppliers

GOMMUS adopts an objective approach towards suppliers, focused on assessing the quality/price ratio of supplies and free from favouritism, in order to protect the Company's interests.

GOMMUS also undertakes not to abuse any contractual bargaining power by imposing unfair or excessively burdensome conditions, thereby promoting the development of its supply chain and encouraging suppliers to meet high quality standards.

In particular, personnel involved in procurement processes are required to:

- not prevent any party meeting the required criteria from competing for contracts, and to use objective and documentable criteria when selecting candidates;
- ensure sufficient competition in every tender or procurement selection, considering, where possible, a minimum number of companies when selecting a supplier.

It is also prohibited to:

- accept gifts or any item that may represent a personal benefit from supplier companies;
- accept remuneration or other benefits in cash or in kind, or consultancy/collaboration assignments in any form or manner, offered by or originating from companies that have entered into supply contracts with GOMMUS.

	ORGANISATION, MANAGEMENT AND CONTROL MODEL <i>(PURSUANT TO LEGISLATIVE DECREE 231/01)</i>	Rev.:	0
		Dated:	

Relations with Personnel and Protection of the Individual

GOMMUS recognises the value of human resources, respects their autonomy and promotes their active participation in Company life, prohibiting any discrimination based on sex, ethnicity, political opinions or religious beliefs, both during recruitment and in the performance of work duties.

Personnel Selection

Personnel are hired under regular employment contracts; no form of undeclared or irregular work is permitted.

Candidates are assessed on the basis of how their profiles match the required profiles and the Company's needs. The information requested is strictly related to verifying the requirements of the professional and/or aptitude profile, with respect for the candidate's privacy and opinions and in compliance with equal opportunities for all interested parties.

The responsible function adopts appropriate measures to avoid favouritism or patronage in recruitment and hiring, in particular by ensuring that the recruiter is not related to the candidate.

Personnel Development

GOMMUS is committed to preserving and increasing the value of its "human capital" through professional training activities.

GOMMUS is also committed to a culture of occupational safety, which it promotes through measures aimed at protecting health and safety in compliance with applicable prevention and protection legislation.

Duties of Personnel

Personnel undertake to cooperate diligently and conscientiously in developing a proper employment relationship.

Personnel shall act loyally in order to comply with the obligations undertaken under their employment contract and the provisions of the Code of Ethics, ensuring the required performance.

Workers, starting with directors and managers, undertake to avoid conflicts of interest and not to accept benefits or gifts from third parties unless they are merely customary courtesies of negligible economic value.

In particular, in performing their activities, GOMMUS personnel may not:

- hold a managerial position and have economic interests with suppliers, customers or competitors, including through family members and relatives;
- without GOMMUS's consent, provide professional services as an employee, consultant or member of a Board of Directors to competing companies;
- use Company assets at work or during leisure time, or provide products offered by GOMMUS to its customers, without prior authorisation from the competent corporate function or direct supervisor;
- represent, act or work on behalf of a supplier or customer in conflict with GOMMUS's interests.

It is also prohibited to accept and/or receive money or other favours for advice or services provided in connection with ordinary business activities. Personnel may not carry out, during working hours, other activities unrelated to their assigned duties.

	ORGANISATION, MANAGEMENT AND CONTROL MODEL <i>(PURSUANT TO LEGISLATIVE DECREE 231/01)</i>	Rev.:	0
		Dated:	

Use of Company Assets

Company assets may not be used for personal purposes or interests of any kind.

Each employee shall act diligently to protect Company assets, through responsible conduct and in accordance with the operating procedures established to regulate their use.

In particular, each employee shall:

- avoid private use of Company assets;
- use entrusted assets carefully and economically;
- avoid improper use of Company assets that may cause damage or reduced efficiency or otherwise conflict with the Company's interests.

With regard to IT applications (for example, tools for Internet access, e-mail services, etc.), each employee is required to:

- use them in accordance with the instructions and for the purposes for which they are made available;
- strictly comply with Company security policies so as not to compromise the functionality and protection of IT systems;
- not send threatening or insulting e-mail messages;
- not make inappropriate comments that may offend individuals and/or damage the Company's image;
- not browse websites containing indecent and/or offensive content.

Protection of the Individual

The Company respects fundamental principles such as the protection of individuals' physical, moral and cultural integrity, ensuring working conditions that respect individual dignity and safe workplaces. The Company's Code of Ethics expressly prohibits any form of racist or xenophobic propaganda, including incitement to racism or xenophobia by worker-members, employees or collaborators of the Company.

Any form of psychological, physical or sexual harassment, abuse by a hierarchical superior of their position of authority, or any form of intimidation or threat that interferes with the peaceful performance of work activities is expressly prohibited.

All Recipients of the Model and all persons acting in the name and on behalf of GOMMUS are required to operate in a manner that ensures a peaceful working environment free from prejudice, in accordance with the values of civil coexistence, mutual respect and equal social dignity, without discrimination on grounds of nationality, language, sex, race, religious belief, political or trade-union affiliation, or physical or mental condition.

GOMMUS requires each employee to contribute personally to ensuring a working environment that respects the sensitivities of others.

Accordingly, the following shall be considered detrimental to such characteristics and are therefore prohibited:

- working while under the effects of alcohol abuse, narcotic drugs or substances having similar effects;
- consuming or supplying narcotic drugs on any basis during working hours.

Relations with Institutions and the Public Administration

GOMMUS actively cooperates with the Public Administration and the bodies appointed by it, in accordance with principles of transparency.

	ORGANISATION, MANAGEMENT AND CONTROL MODEL <i>(PURSUANT TO LEGISLATIVE DECREE 231/01)</i>	Rev.:	0
		Dated:	

Relations with institutions, where necessary for the development of GOMMUS's objectives, are reserved exclusively to the corporate functions specifically delegated for this purpose.

Such relations shall be characterised by the utmost transparency, clarity and fairness and shall not give rise to partial, distorted, ambiguous or misleading interpretations by the public institutional entities with which relations are maintained in various capacities.

In particular, in relations with the Public Administration, it is prohibited to:

- offer money or gifts to managers, officials or employees of the Public Administration or to their relatives;
- engage in active or passive corruption or collusive conduct of any kind. If directors, managers, employees or third parties acting on behalf of GOMMUS receive, directly or indirectly, requests for money or other benefits from directors, managers, officials and/or employees of the Public Administration, they must under no circumstances comply with such requests and must promptly inform their direct supervisor, the Governing Body and the Supervisory Body so that appropriate measures may be assessed;
- accept any item, service, benefit or favour of value;
- improperly influence the decisions of the counterparty;
- use external consultants who have a conflict of interest.

Relations with Judicial Authorities

In relations with Judicial Authorities, it is expressly prohibited to engage in, or incite others to engage in, corrupt practices of any kind. Where the Company is a party to judicial or out-of-court proceedings in civil, criminal, administrative or tax matters, Company personnel and anyone acting in the name and/or on behalf of the Company shall not in any way engage in conduct towards judicial authorities, court registry officials or judicial officers intended to induce such persons to adopt measures that unlawfully benefit the Company.

Relations with Political Parties, Trade Unions and Associations

GOMMUS may not make direct or indirect contributions in any form, nor allocate funds or financing in support of Italian or foreign political organisations and movements, trade unions or associations, except as permitted and provided for by applicable laws and regulations.

The sole exception to the above prohibition concerns requests for contributions from non-profit bodies, associations and foundations, to which contributions may be made provided that the relevant activity has significant social, cultural, environmental, scientific research or charitable value involving a large number of citizens.

10. RELATIONS WITH MEMBERS AND PROTECTION OF COMPANY ASSETS

GOMMUS undertakes to ensure equal treatment of all members, avoiding preferential treatment and conflicts with minority interests within the Company.

GOMMUS's Company assets shall be protected by everyone; they include tangible physical assets such as buildings, infrastructure, equipment, computers, printers, motor vehicles, means of transport and fuel, as well as intangible assets of any kind, including trademarks, licences, confidential information, know-how and technical knowledge.

The protection and preservation of these assets is a fundamental value for safeguarding the Company's interests, and personnel are responsible not only for protecting such assets but also for preventing their fraudulent or improper use.

	ORGANISATION, MANAGEMENT AND CONTROL MODEL <i>(PURSUANT TO LEGISLATIVE DECREE 231/01)</i>	Rev.:	0
		Dated:	

11. ACCOUNTING RECORDS AND CORPORATE TRANSACTIONS

The Company follows the principles of truthfulness, accuracy, completeness and clarity in accounting records in order to ensure a clear and true representation of the Company's economic, asset and financial position.

Each operation or transaction is recorded in the Company accounting system in accordance with the criteria established by law and applicable accounting standards.

All Recipients of this Code undertake to prevent receiving stolen goods, money laundering, self-laundering and the financing of criminal activities.

The Company:

- uses qualified suppliers;
- verifies available information on counterparties;
- makes and receives traceable payments;
- uses cash only within the limits permitted by law.

12. HANDLING OF CONFIDENTIAL INFORMATION

Information relating to stakeholders is processed by GOMMUS in full compliance with the confidentiality and privacy of the data subjects concerned.

GOMMUS requires third parties involved in processing information to sign confidentiality agreements.

By way of example, confidential information to be classified as the exclusive property of GOMMUS includes:

- strategic, economic and financial plans, accounting, commercial and operational documents;
- projects and investments;
- personnel data, such as absences, attendance, holidays, sickness and remuneration;
- Company production parameters for individual departments and divisions;
- corporate agreements, commercial agreements and contracts, and Company documents of all kinds;
- know-how relating to the production, development and marketing of products and any patents;
- Company manuals;
- databases containing, for example, lists of suppliers, customers and employees.

When handling such data and information, personnel shall exercise the utmost care and confidentiality and avoid disclosing information owned by GOMMUS to colleagues or third parties. If employees receive requests from external parties to disclose news or information concerning GOMMUS, they shall refrain from providing it directly or indirectly and shall refer the request to the competent corporate function.

13. HEALTH AND SAFETY IN THE WORKPLACE

The Company attaches great importance to the physical and moral integrity of its employees and collaborators, ensuring working conditions that respect individual dignity and safe and healthy workplaces; accordingly, the Company promotes and consolidates a culture of worker health and safety by developing risk awareness and encouraging responsible conduct by all personnel.

All Recipients of this Code, within the scope of their duties, participate in the risk-prevention process and in protecting their own health and safety and that of colleagues and third parties. In particular, occupational safety documents (procedures, operating instructions, manuals, etc.) are made available

	ORGANISATION, MANAGEMENT AND CONTROL MODEL <i>(PURSUANT TO LEGISLATIVE DECREE 231/01)</i>	Rev.:	0
		Dated:	

to all personnel in order to ensure that they are effectively known and observed, including through an appropriate training plan.

The corporate bodies shall ensure compliance, by the Company and by all persons acting in its name and on its behalf, with the provisions contained in the Risk Assessment Documents (which are deemed incorporated herein in full) and, more generally, with the requirements of Legislative Decree No. 81/2008 and all applicable laws and regulations concerning accident prevention and occupational hygiene and health, ensuring fulfilment of all related legal obligations, including those relating to:

- compliance with statutory technical and structural standards concerning buildings, equipment, systems, machinery, devices, workplaces and chemical, physical and biological agents;
- risk assessment activities and the preparation of resulting prevention and protection measures;
- organisational activities such as emergencies, first aid, contract management, periodic safety meetings and consultation with workers' safety representatives;
- health surveillance activities;
- worker information and training activities;
- supervisory activities concerning workers' and specifically assigned personnel's compliance with safe-working procedures and instructions;
- obtaining mandatory statutory documentation and certifications;
- periodic verification of the implementation and effectiveness of adopted procedures.

The Company's corporate bodies shall ensure that the Company has an organisational structure providing a clear allocation of tasks and responsibilities concerning accident prevention and occupational hygiene and health, formally defined in accordance with the Company's organisational and functional structure and with statutory and regulatory requirements, from the employer down to each individual worker.

All persons assigned, by law or by an internal Company measure, specific duties concerning accident prevention and occupational hygiene and health (corporate bodies, Head of the Prevention and Protection Service, Prevention and Protection Service personnel, Occupational Physician, etc.), each within the limits of their assigned duties, shall strictly comply with every obligation to act, refrain from acting, supervise, update and with any other duty connected with their role and function or provided for in their appointment or by law.

The Company's corporate bodies are required to supervise and monitor, or ensure that third parties acting on the Company's behalf supervise and monitor, compliance by the responsible persons with the obligations assigned to each of them.

In order to ensure the effectiveness of the system adopted by the Company concerning accident prevention and occupational hygiene and health, all Company employees and all persons acting on behalf and in the interests of the Company are required to take care of their own health and safety and that of other persons present in the workplace, in accordance with their training and the instructions and resources provided by the Company.

In particular, they are required to:

- contribute, together with the Company, its corporate bodies, managers and supervisors, to fulfilment of the obligations established to protect health and safety in the workplace;
- comply with the provisions and instructions issued by the Company, managers and supervisors for collective and individual protection;
- properly use machinery, equipment, means of transport and other work equipment and tools, as well as safety devices;
- properly use the personal protective equipment provided;

	ORGANISATION, MANAGEMENT AND CONTROL MODEL <i>(PURSUANT TO LEGISLATIVE DECREE 231/01)</i>	Rev.:	0
		Dated:	

- immediately report to the corporate bodies, the Head of the Prevention and Protection Service and the Supervisory Body any deficiencies in protection and safety equipment and devices, as well as any other hazardous conditions of which they become aware, and, in urgent cases and within the scope of their competence and possibilities, take direct action to eliminate or reduce such deficiencies or hazards, informing the workers' safety representative;
- undergo health checks required by law or otherwise ordered by the Occupational Physician;
- participate in training and instruction programmes organised by the employer;
- contribute to fulfilment of all obligations necessary to protect workers' health and safety during the performance of activities.

14. ENVIRONMENT

The environment is an asset whose protection the Company promotes.

Recipients of this Code contribute, in performing their duties, to the environmental protection process. For the Company, respect for the environment is a core value in meeting one of the primary needs of individual citizens and the community as a whole.

All activities are carried out in full compliance with applicable environmental laws and regulations and existing internal procedures.

The Company directs its choices so as to ensure compatibility between economic initiative and environmental requirements.

The Company's operations are managed according to advanced environmental protection criteria, pursuing continuous improvement in environmental protection conditions.

15. INTERNAL AND EXTERNAL COMMUNICATIONS

Any information, document or other material obtained by Recipients of this Code by virtue of their professional relationship with the Company is strictly confidential.

Persons who, by virtue of their duties, have access to inside or privileged information concerning the Company (for example, information regarding management changes, Company projects, plans and budgets, etc.) may not use such information for their own benefit and/or that of family members, acquaintances or third parties.

They shall also take particular care not to disclose such information, to prevent its acquisition by third parties and to avoid any improper use thereof.

Information and/or any other news, documents or data that are not in the public domain and relate to the Company's activities shall not be disclosed, used or communicated externally without prior authorisation.

Particular care and attention shall be paid to the dissemination of information relevant to the life of the Company, on the assumption that comprehensive and clear communication ensures proper management of relations with parties with which the Company comes into contact and with public supervisory authorities.

External information shall be truthful, clear and transparent.

Employees may not provide information or undertake to provide it without authorisation, within the limits provided by law.

16. PRIVACY

The privacy of collaborators/employees is protected by adopting standards specifying the information that the Company requests from collaborators/employees and the related methods of processing and retention.

	ORGANISATION, MANAGEMENT AND CONTROL MODEL <i>(PURSUANT TO LEGISLATIVE DECREE 231/01)</i>	Rev.:	0
		Dated:	

Any investigation into collaborators' ideas, preferences, personal tastes and, more generally, private lives is prohibited. These standards also prohibit, except where provided by law, the communication/dissemination of personal data without the prior consent of the data subject and establish rules enabling each collaborator to monitor compliance with privacy-protection requirements.

The Company applies the GDPR within the limits provided by law and monitors its proper implementation.

17. IT RESOURCES

IT resources are effective management tools that Recipients of this Code are required to use exclusively for activities falling within their remit and in full compliance with the methods established by the Company in internal procedures, regulations and practices.

The Company promotes the proper use of IT tools and seeks to prevent any use involving the collection, storage and/or dissemination of data and information for purposes other than those permitted.

Use of the aforementioned tools shall be subject to periodic monitoring and checks by the Company.

18. GIFTS AND HOSPITALITY

No form of gift or hospitality is permitted where it could be interpreted as exceeding normal commercial or courtesy practices, or in any event as intended to obtain preferential treatment in the conduct of any activity carried out by or otherwise connected with the Company.

In particular, any form of gift or hospitality to Italian or foreign public officials or persons entrusted with a public service, or to their family members, that could influence their independence of judgement or induce them to secure any advantage is prohibited.

Recipients of this Code of Ethics who receive gifts or hospitality that do not fall within permitted categories shall immediately notify the Supervisory Body and the Governing Body, which shall assess their appropriateness and inform the sender of the Company's policy in this regard.

19. CONTRIBUTIONS TO THIRD PARTIES

Members of the Company, the Governing Body and Personnel shall not be implicated or involved, including by way of participation, in transactions that may constitute money laundering or self-laundering of proceeds from criminal or, more generally, unlawful activities.

Sponsorships and charitable donations shall be consistent with the Company's values, authorised and approved by the Governing Body and under no circumstances intended to obtain an unlawful advantage.

20. SUBSIDIARIES AND ASSOCIATED COMPANIES

The Company exercises its shareholder/member rights in the interests of the companies concerned; where it controls other companies, it performs its coordination function while refraining from conduct that could damage the assets of the subsidiary (without prejudice to the principle of compensatory advantage).

In managing commercial relations with subsidiaries and associated companies, GOMMUS uses specific intra-group agreements at market value.

21. ADOPTION OF THE CODE OF ETHICS

In compliance with applicable legislation and with a view to planning and managing Company activities in accordance with efficiency, fairness, transparency and quality, the Company adopts appropriate measures to prevent unlawful conduct, or conduct otherwise contrary to the rules and

	ORGANISATION, MANAGEMENT AND CONTROL MODEL <i>(PURSUANT TO LEGISLATIVE DECREE 231/01)</i>	Rev.:	0
		Dated:	

principles of the Code, by any person acting in the name and/or on behalf of the Company or in its interests.

The task of supervising the operation of and compliance with the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001, as subsequently amended, of which this Code forms an integral part, is entrusted to the Supervisory Body, which has autonomous powers of initiative and control and is not subject to reporting constraints that could in any way prevent or limit its activities.

22. REPORTING VIOLATIONS AND WHISTLEBLOWING

Cases involving breaches of the principles and/or rules of this Code shall be promptly reported in writing to the Supervisory Body or through communication channels designed to ensure the protection and anonymity of the reporting person:

- by e-mail to the following address: **odv@gommus.it**
- **reporting anonymously:**
 1. In writing, by accessing the Company website, Whistleblowing section, using the dedicated IT procedure: <https://gommus-wb.valuefarm.it/#/>
 2. Orally, by contacting the Reporting Manager at the dedicated telephone number: **enter number**

Duty to Report

Anyone who becomes aware of breaches of the principles of this Code and/or of the Organisation, Management and Control Model pursuant to Legislative Decree 231/01, Company regulations or any other matter potentially relevant to the application of the rules is required to report them promptly to the Supervisory Body or through the channels established to protect the anonymity of the reporting person.

The Company applies the provisions of Legislative Decree No. 24 of 10 March 2023 concerning the protection of persons who report breaches of national regulatory provisions (Whistleblowing).

23. DISCIPLINARY SYSTEM

Any breach of the principles and/or rules contained in this Code shall constitute a disciplinary offence or a breach of the contractual obligations arising from the employment, functional or professional collaboration relationship, with all resulting consequences under law and contract, including pursuant to Articles 2104 and 2105 of the Italian Civil Code.

The Company shall impose, impartially, consistently and uniformly, the disciplinary sanctions provided for in the adopted “Disciplinary System”.

24. PUBLICATION

The Code of Ethics is always available at the Company’s offices and published on the Company website so that all Recipients may review and acknowledge it.

The Company promotes all initiatives necessary to ensure the widest possible dissemination of the Code, including through internal and/or external communications, and also provides all customers, principals and business partners with the text of the document or a link to download it from the website.